

E-FILED 7/9/15

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

CONSTRUCTION LABORERS TRUST
FUNDS FOR SOUTHERN
CALIFORNIA ADMINISTRATIVE
COMPANY, a Delaware limited liability
company,

Plaintiff,

vs.

CENTURY SPECIALTIES CORP., a
California corporation also known as and
doing business as CENTURY FENCES,
and/or CENTURY FENCES INC;
BRADLEY HILTON ROBBINS, an
individual also known as BRAD
ROBBINS; AMERICAN
CONTRACTORS INDEMNITY
COMPANY, a California corporation,

Defendants.

CASE NO.: CV15-03162 PSG (VBKx)

~~[PROPOSED]~~ SEVERAL
JUDGMENT PURSUANT TO
STIPULATION

Pursuant to the Stipulation for Entry of Judgment by and between Plaintiff,
CONSTRUCTION LABORERS TRUST FUNDS FOR SOUTHERN CALIFORNIA
ADMINISTRATIVE COMPANY, a Delaware Limited Liability Company, through
its attorneys, Reich, Adell & Cvitan, A Professional Law Corporation, by Marsha M.

1 Hamasaki, and Defendants, CENTURY SPECIALTIES CORP., a California
2 corporation also known as and doing business as CENTURY FENCES, and/or
3 CENTURY FENCES INC., and BRADLEY HILTON ROBBINS, an individual also
4 known as BRAD ROBBINS through their attorneys, Justin G. Schmidt, and good
5 cause appearing therefor,

6 IT IS HEREBY ORDERED, ADJUDGED and DECREED that: A Several
7 Judgment is entered in favor of Plaintiff, CONSTRUCTION LABORERS TRUST
8 FUNDS FOR SOUTHERN CALIFORNIA ADMINISTRATIVE COMPANY, a
9 Delaware Limited Liability Company, the administrator, agent for collection and a
10 fiduciary to the Laborers Health And Welfare Trust Fund For Southern California,
11 Construction Laborers Pension Trust For Southern California, Construction Laborers
12 Vacation Trust For Southern California, Laborers Training And Re-Training Trust
13 Fund For Southern California, Fund For Construction Industry Advancement, Center
14 For Contract Compliance, Laborers Contract Administration Trust Fund For Southern
15 California, Laborers' Trusts Administrative Trust Fund For Southern California and
16 Southern California Partnership For Jobs Trust Fund, and against Defendants,
17 CENTURY SPECIALTIES CORP., a California corporation also known as and
18 doing business as CENTURY FENCES, and/or CENTURY FENCES INC.
19 ("EMPLOYER"); and BRADLEY HILTON ROBBINS, an individual also known as
20 BRAD ROBBINS ("ROBBINS"), individually, jointly and severally, for the principal
21 sum of \$125,630.93 relating to known delinquencies incurred during the period from
22 May 2011 to April 2015 and \$5,000.00 in attorney's fees, for a total judgment sum of
23 \$129,630.93.

24 The money JUDGMENT to be entered in this action is for known delinquencies
25 incurred for the period from May 2011 through April 2015 ; however, the TRUST
26 FUNDS, ROBBINS and EMPLOYER have stipulated that since the partial audit of
27 EMPLOYER'S records did not cover the entire period from January 2013 to April
28 2015, therefore, if any additional amounts are discovered to be owed by EMPLOYER

1 and ROBBINS during this time period, the money judgment in this action shall not
2 operate as a bar and/or have res judicata effect or any other limitation of any legal
3 right of the Plaintiff or TRUST FUNDS to determine and seek collection of any
4 amount due, or that comes due by CENTURY SPECIALTIES CORP., a California
5 corporation also known as and doing business as CENTURY FENCES, and/or
6 CENTURY FENCES INC. and/or BRADLEY HILTON ROBBINS, an individual to
7 any one or more of the TRUST FUNDS during the period from January 2013 to April
8 2015.

9 The Court finds that there is no just reason for delay in the entry of a final
10 Several Judgment against Defendants, CENTURY SPECIALTIES CORP., a
11 California corporation also known as and doing business as CENTURY FENCES,
12 and/or CENTURY FENCES INC. and BRADLEY HILTON ROBBINS, as all claims
13 asserted by Plaintiff on its Complaint are resolved, leaving AMERICAN
14 CONTRACTORS INDEMNITY COMPANY to proceed on its Cross-Claim.

15 DATED: 7/9/15

PHILIP S. GUTIERREZ

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17 PHILLIP S. GUTIERREZ
UNITED STATES DISTRICT JUDGE
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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party of the within action. My business address is 3550 Wilshire Boulevard, Suite 2000, Los Angeles, CA 90010.

On **July 7, 2015**, I served a copy of the document described as: **[PROPOSED] SEVERAL JUDGMENT PURSUANT TO STIPULATION**, on the interested parties in this action who are identified below using the following means of service):

Bradley T. Robbins
Century Specialties Corp. aka dba
Century Fences, and/or Century Fences, Inc.
P. O. Box 3248
Gardena, CA 90247

Justin G. Schmidt
17011 Beach Blvd., Suite 900
Huntington Beach, CA 92647

Attorney for Century Specialties Corp.
and Bradley Hilton Robbins

X **BY FIRST CLASS MAIL:** I placed the original or **x** a true and correct copy of the document in sealed envelope(s) individually addressed to each of the parties, and caused each such envelope to be deposited in the mail. Each envelope was mailed with postage thereon fully prepaid. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice, mail is deposited with the U.S. Postal Service on the same day that it is collected in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing shown in this proof of service.

BY PERSONAL SERVICE: I placed the original or a true and correct copy of the foregoing document in sealed envelope(s) individually addressed to each of the parties listed above, and caused such envelope to be delivered by hand to the offices of each addressee

Executed on **July 7, 2015**, at Los Angeles, California.

X **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court, at whose direction the service was made.

/s/
Virginia Alvarez